

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

CLERK'S OFFICE U.S. DIST. COURT
AT ABINGDON, VA
FILED

MAY 03 2011

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

KEVIN LEE LUNSFORD

Case No.: 1:11CR17

MOTION FOR VOLUNTARY DISCLOSURE OF GRAND JURY AND
OTHER MATERIALS AND FOR LIMITATIONS ON FURTHER DISCLOSURE

The United States, by counsel, moves pursuant to Federal Rules of Criminal Procedure 6(e), 16, and 26.2, pursuant to 26 U.S.C. §§ 6103(h)(4)(D) and (i)(4)(A), and pursuant to the authority of this Court to regulate proceedings before it, that the United States be permitted to disclose to counsel for the defense as part of voluntary discovery, grand jury, tax return, criminal histories, and other investigative materials. The United States also requests that the Court permit the United States and defense counsel to use this material for the prosecution and defense of the case, respectively, and to make such further disclosures as may be necessary for, and for the sole purpose of, prosecuting and defending this case. The United States submits the accompanying proposed Order in the interest of both advancing the case and protecting the secrecy of grand jury, tax return, criminal histories, and other investigative materials. The attached proposed order would prevent the unauthorized dissemination of materials voluntarily provided by the United States and would provide notice of sanctions in the event these materials were deliberately disclosed in an unauthorized manner or to unauthorized persons.

Respectfully submitted,

TIMOTHY J. HEAPHY
United States Attorney

A handwritten signature in black ink, appearing to read 'Zachary T. Lee', with a stylized flourish at the end.

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